

Mr. Larry Hilgeman
Aristokraft, Inc.
One Aristokraft Square
P.O. Box 420
Jasper, Indiana 47547-0420

Re: Significant Source Modification No:
037-11809-00015

Dear Mr. Hilgeman:

Aristokraft, Inc. applied for a Part 70 operating permit on May 24, 1996 for a wood office furniture manufacturing facility. An application to modify the source was received on January 24, 2000. Pursuant to 326 IAC 2-7-10.5(g), the following emission units are approved for construction and operation at the source:

Woodworking operations, located in Plants #2/32, identified as MC3, equipped with a baghouse for particulate control, with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask extension 3-8396, or dial (317) 233-8396.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

kt

cc: File – Dubois County
U.S. EPA, Region V
Dubois County Health Department
Air Compliance Section Inspector – Ray Schick
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner
Title V Permit File – T037-5929-00015

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

**Aristokraft – Plants #2/32
One Aristokraft Square
Jasper, Indiana 47547**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 037-11809-00015	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood office furniture manufacturing facility.

Responsible Official: Mr. Kurt Wanninger
Source Address: One Aristokraft Square, Jasper, Indiana 47547
Mailing Address: One Aristokraft Square, P.O. Box 420, Jasper, Indiana 47547-0420
Phone Number: 812-482-2527
SIC Code: 2521
County Location: Dubois
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

Woodworking operations, located in Plants #2/32, identified as MC3, equipped with a baghouse for particulate control, with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

- B.1 Permit No Defense [IC 13]
This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- B.2 Definitions [326 IAC 2-7-1]
Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.
- B.3 Effective Date of the Permit [IC13-15-5-3]
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
- B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]
Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
- B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]
This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:
- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
 - (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
 - (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
 - (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.
- (2) If the Title V permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.
- (3) If the Title V permit has not gone through final EPA review and would be issued after the

Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

SECTION C

GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP-s shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the responsible official as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

- C.8 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this approval until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.9 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]
(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this approval;
 - (3) The Compliance Monitoring Requirements in Section D of this approval;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP-s shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
 - (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
 - (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within Anormal@parameters and no response steps are required.
 - (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the Responsible official as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.11 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this approval;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Woodworking operations, located in Plants #2/32, identified as MC3, equipped with a baghouse for particulate control, with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Rules: Particulate Emissions Limitations [326 IAC 6-1-2]

The particulate matter (PM) from all woodworking operations listed in the Facility Description shall each be limited to 0.03 grain per dry standard cubic foot (dscf) for each unit.

D.1.2 Emission Limitations

The total source emissions shall be less than 250 tons per year for each criteria pollutant. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter (PM)

The baghouses for all woodworking operations being used for PM control shall be in operation at all times the woodworking operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations, when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhaust.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Aristokraft – Plants #2/32
Source Address: One Aristokraft Square, Jasper, Indiana 47547
Mailing Address: One Aristokraft Square, P.O. Box 420, Jasper, Indiana 47547-0420
Source Modification No.: 037-11809-00015

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
9 Report (specify) _____
9 Notification (specify) _____
9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Aristokraft – Plants #2/32
One Aristokraft Square, P.O. Box 420
Jasper, Indiana 47547-0420

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make
these representations on behalf of _____.
(Company Name)
4. I hereby certify that Aristokraft – Plants #2/32, One Aristokraft Square, Jasper, Indiana, has constructed the
woodworking operations in conformity with the requirements and intent of the construction permit application
received by the Office of Air Management on January 25, 2000 and as permitted pursuant to **Construction**
Permit No. 037-11809, Plant ID No. 037-00015 issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA()SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____.

My Commission expires: _____

Signature

Name (typed or printed)

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Significant Source Modification

Source Name:	Aristokraft – Plants #2/32
Source Location:	One Aristokraft Square, Jasper, Indiana 47547
County:	Dubois
SIC Code:	2521
Operation Permit No.:	T037-5929-00015
Operation Permit Issuance Date:	not issued yet
Significant Source Modification No.:	037-11809-00015
Permit Reviewer:	Kimberly Titzer

On February 12, 2000, the Office of Air Management (OAM) had a notice published in *The Herald*, Jasper, Indiana, stating that Aristokraft – Plants #2/32 had applied for a construction permit to construct and operate woodworking operations. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 10, 2000, Aristokraft commented on the permit as follows:(bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

Comment 1: The name of the facility is listed throughout the permit as “Aristokraft, Inc. – Plants #2/32.” We request that this be changed to “Aristokraft – Plants #2/32.”

Response: All references to “Aristokraft, Inc. – Plants #2/32” shall be changed to “Aristokraft – Plants #2/32 in the permit.

Comment 2: Condition D.1.2 Emission Limitations
We do not believe that this condition is necessary. The facility has already accepted a 249 ton limit for VOC and the proposed modification does not affect rule applicability. Additionally, the 0.01 gr/dscf limit restricts emissions to 22.9 tpy.

Response 2: An emission cap restricts each criteria pollutant to less than 250 tons per year. Therefore, particulate matter also is restricted to 249 tons per year. Also, the emission cap accepted by Aristokraft is not enforceable since it has not been referenced in an issued operating permit. Therefore, the condition to restrict each criteria pollutant to less than 250 tons per year shall remain in the permit for enforceability. In addition, the emission limitation condition shall be included in the Title V Operating Permit as well. For clarification, the following change was made to the emission limitation condition to include all criteria pollutants:

D.1.2 Emission Limitations
The total source emissions shall be less than 250 tons per year **for each criteria pollutant**. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Comment 3: Condition D.1.6 Visible Emissions Notations

We request that this condition be eliminated from the permit. This condition requires daily visible emission notations for each of the woodworking baghouse stacks. The actual emissions from MC3 are less than 10 lbs/hr, and therefore we do not believe that compliance monitoring is warranted for this smaller emission unit.

Response 3: The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. The woodworking operations do require the baghouses to stay in compliance. Therefore, the visible emission observations are required for the woodworking operations. No changes were made as a result of this comment.

Comment 4: Condition D.1.7 Baghouse Inspections

We would request that this condition be eliminated, since the intent of this condition is already covered by other conditions, which may in fact conflict with this condition. Baghouse inspections should more appropriately be included under our Preventative Maintenance Plan, rather than be addressed as a specific permit condition. If there is a specific applicable requirement for such inspections beyond the requirement for a Preventative Maintenance Plan, we would like to know the reference for such a requirement.

Response 4: 326 IAC 2-7-5(3)(A) gives the OAM the authority to require any necessary compliance monitoring to ensure the source is in compliance with the Part 70 permit requirements. The OAM believes that quarterly baghouse and cyclone inspections are necessary to ensure the control equipment is operating properly. 326 IAC 2-7-5(3)(A) gives the OAM the authority to require any necessary compliance monitoring to ensure the source is in compliance with the Part 70 permit requirements. The OAM believes that quarterly baghouse and cyclone inspections are necessary to ensure the control equipment is operating properly.

Comment 5: Condition D.1.8 Broken or Failed Bag Detection

We would request that this condition be eliminated, since the intent of this condition is already covered by other conditions, which may in fact conflict with these conditions. The Emergency Provisions in Section B address situations such as the failure of control equipment. The requirements of this condition do not appear to be based on a specific applicable requirement and may in fact conflict with the requirements of Section B.

Response 5: Pursuant to 326 IAC 2-7-5(1)(F), each Part 70 permit is required to contain conditions which minimize excess emissions to the extent feasible, caused by events such as a bag failure. The requirements shall take into consideration available technologies, safety cost, and other relevant factors. The OAM does not consider shutting down the baghouse and associated production equipment to be infeasible in this case. Many sources which vent their baghouse exhaust in the buildings during winter months will shutdown production during such bag failures.

A bag failure could be construed as an emergency as defined in condition B.13 for purposes of an affirmative defense against a violation of the specific permit condition. However, once the bag failure is observed, continuing to operate the equipment will vent uncontrolled particulate matter to the atmosphere. IDEM will likely not consider this an attempt by the permittee to take all reasonable steps to minimize levels of emissions that exceed an emission standard or other requirement in the permit.

Therefore the OAM believes that the requirement to shutdown the affected compartments is a reasonable action to ensure compliance with the particulate matter limitations. No changes were made as a result of this comment.

Comment 6: Record Keeping Requirements

This condition requires documentation to show compliance with Conditions D.1.6 and D.1.7. Since we are requesting that both conditions be eliminated from the permit, we likewise request that this condition be deleted.

Response 6: No changes were made to the permit to remove any of the referenced conditions, therefore, the recordkeeping condition shall remain unchanged.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Significant Source Modification

Source Background and Description

Source Name:	Aristokraft, Inc. – Plants #2/32
Mailing Address:	One Aristokraft Square, P.O. Box 420 Jasper, Indiana 47547-0420
County:	Dubois
SIC Code:	2521
Operation Permit No.:	T037-5929-00015
Operation Permit Issuance Date:	not issued yet
Significant Source Modification No.:	037-11809-00015
Permit Reviewer:	Kimberly Titzer

The Office of Air Management (OAM) has reviewed a modification application from Aristokraft, Inc. relating to the construction of the following emission units and pollution control devices:

Woodworking operations, located in Plants #2/32, identified as MC3, equipped with a baghouse for particulate control, with a maximum capacity of 61,000 acfm and 0.01 gr/dscf, and exhausting to stack C2.

History

On January 24, 2000, Aristokraft, Inc. submitted an application to the OAM requesting to add additional woodworking operations to their existing plant. Currently, Aristokraft, Inc. has not been issued a Part 70 permit.

Source Definition

This wood office furniture manufacturing company consists of two (2) plants:

- (1) Plant 2 is located at 14th Street and Aristokraft Square, Jasper, Indiana 47547; and
- (2) Plant 32 is located at One Aristokraft Square, Jasper, Indiana 47547.

Since the two (2) plants are located in contingent properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
C2	woodworking	Not given	Not given	61,000	70

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 24, 2000.

Emission Calculations

See page 5 of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.®

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. The potential to emit from the woodworking operations is as follows:

Pollutant	Potential To Emit (tons/year)
PM	2290.7
PM-10	2290.7
SO ₂	0
VOC	0
CO	0
NO _x	0

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification, because the potential to emit before controls is greater than twenty-five (25) tons per year. This modification is being performed pursuant to 326 IAC 2-7-10.5(f). This approval is for the construction and operation of new emission units.

County Attainment Status

The source is located in Dubois County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Dubois County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Woodworking (MC3)	22.91	22.91					
Source-wide PSD Limit	<250.0	<250.0		<250.0			

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

- (1) This existing source has taken a 249 ton per year limit to be considered a Minor Source under PSD applicability.

This modification to an existing minor stationary source shall not be considered major because the source has taken a source-wide 249.0 tons per year limitation. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability – woodworking operations

326 IAC 6-1-2 Particulate Matter Limitations

Pursuant to 326 IAC 6-1-2 (Nonattainment area particulate limitations), the particulate matter (PM) from the woodworking operations, identified as MC3 shall be limited to 0.03 grain per dry standard cubic foot (dscf).

The baghouse shall be in operation at all times the woodworking operations are in operation, in order to comply with this limit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

- (1) The woodworking operations have applicable compliance monitoring conditions as specified below:

(a)	Visible Emissions Notations
(a)	Daily visible emission notations of the baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
(b)	For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
(c)	In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
(d)	A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
(e)	The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
(b)	Baghouse Inspections
	An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
(c)	Broken or Failed Bag Detection
	In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-1-2 (Nonattainment area particulate limitations) and 326 IAC 2-7 (Part 70).

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 037-11809-00015.

Emission Calculations

Particulate Matter emissions based on the grain loading of the baghouse:

$$\begin{aligned} E_{out} &= (\text{Outlet grain loading (gr/dscf)})(\text{Air flow rate (dscfm)}) && \text{grain loading} = 0.01 \text{ gr/dscf} \\ &= (0.01 \text{ gr/dscf})(61,000 \text{ dscfm}) && \text{air flow} = 61,000 \text{ dscfm} \\ &= 610 \text{ grains/minute} \\ &= (610 \text{ gr/min})(60 \text{ min/hr})(1 \text{ lb/ 7000 grains}) \\ &= 5.23 \text{ lbs/hr} \\ &= (5.23 \text{ lbs/hr})(8760 \text{ hrs/yr})(1 \text{ ton/ 2000 lbs}) \\ &= 22.91 \text{ tons/year after controls} \\ &= (22.91 \text{ ton/yr})(1/ 1\text{-efficiency of baghouse}) \\ &= (22.91 \text{ tons/yr})(1/ 1-0.99) \\ &= \mathbf{2291 \text{ tons per year before controls}} \end{aligned}$$